

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Civil Action No. 2:23-cv-00641-JRG-RSP

JURY DEMANDED

JOINT MOTION TO AMEND DOCKET CONTROL ORDER

Plaintiff Headwater Research, LLC (“Headwater”) and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”) (all together, the “parties”) respectfully file this Joint Motion to Amend the Docket Control Order entered in the above-captioned case and would show the Court as follows:

The parties have been diligently working to complete discovery but have encountered unavoidable conflicts and other circumstances that provide good cause to modify the schedule as set forth in Exhibit A. The parties are on track to complete nearly all party and third-party depositions in advance of the current close of fact discovery. However, a notable exception is that the previously scheduled deposition of Plaintiff’s sole 30(b)(6) witness, Dr. Greg Raleigh, needed to be postponed due to illness, and the first mutually available date for Samsung’s counsel and Dr. Raleigh is May 23, 2025. Because that deposition will occur after the current deadline for opening expert reports and the parties wish to avoid burdening the Court and one another with motions practice regarding supplementation of expert reports, the parties respectfully seek a brief extension of the expert report deadlines and, relatedly, a three-day extension to the deadline for dispositive

motions and *Daubert* motions. This short extension to the dispositive/*Daubert* motions deadline would still ensure that briefing is completed on July 31, 2025, which is 33 days before the Pretrial Conference scheduled for September 2, 2025.

Accordingly, the parties respectfully request that the Court grant this Joint Motion and enter the accompanying Third Amended Docket Control Order. *See* Ex. A.

Dated: May 13, 2025

/s/ Thad C/ Kodish

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 13th day of May 2025, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Marc Fenster
Marc Fenster

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). The parties are in agreement on filing this Joint Motion.

/s/ Marc Fenster
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